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6 7 8	Attorneys for Defendant ANNA'S LINENS, INC. Plaintiffs' Counsel Listed on the Next Page	PICT COUPT				
9	UNITED STATES DISTRICT COURT					
	NORTHERN DISTRICT OF CALIFORNIA					
10 11						
	CORNELIUS CLARK, CHESTER LEWIS,) CASE NO. C05-02670 MMC				
12	JOHN PONDS and GARRANT COSEY, on behalf	STIBLIL ATION AND ODDED				
13	of themselves and all other similarly situated persons,) STIPULATION AND ORDER) REGARDING EXTENSION OF				
		CLASS CERTIFICATION				
14	Plaintiffs,) DISCOVERY AND BRIEFING) SCHEDULES AND STATUS				
15	VS.) CONFERENCE				
16	ANNA'S LINENS, INC.,	Judge: Hon. Maxine M. Chesney				
17	Defendant.)				
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AIGDO/1034537/1199691v.1

BRIEFING SCHEDULES AND STATUS CONFERENCE

275 Battery Street, Suite 2000 San Francisco, CA 94111 Gordon & Rees LLP

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STIPULATION

Plaintiffs Cornelius Clark, Chester Lewis, John Ponds, and Garrant Cosey ("Plaintiffs") and Defendant Anna's Linens, Inc. ("Anna's Linens") by and through their counsel of record agree that the previous deadlines approved by this Court should be revised as set forth below for the following reasons: Following a three-day mediation before Jerry Spolter of JAMS, the parties have reached a settlement agreement. They are now in negotiations with the EEOC to secure its consent to and joinder in the settlement. The extension of the deadlines as requested herein would allow the Parties to finalize negotiations with the EEOC in the hopes of achieving a global settlement of this dispute and would conserve resources that would otherwise necessarily be spent in completing discovery and preparing to meet all of the deadlines under the current schedule. The Parties, hereby stipulate and respectfully request that the court modify, approve, and adopt the Class Certification Discovery and Briefing Schedules and Status Conference as follows:

Non-Expert Discovery Schedule

Class Certification Briefing Schedule

Motion for Class Certification to be filed by

Complete non-expert interrogatories and document discovery by	July 2, 2007
Complete non-expert depositions (e.g., Parties, Fed.R.Civ.P. 30(b)(6) deponents, witnesses and records custodians) by	July 2, 2007
Expert Discovery and Reports	
Plaintiffs to provide Fed.R.Civ.P. 26(a)(2) expert disclosures by	October 31, 2006
Plaintiffs' expert(s) to be made available for deposition by	May 14, 2007
Defendants to provide Fed.R.Civ.P. 26(a)(2) expert disclosures by	June 11, 2007
Defendants' expert(s) to be made available for deposition by	June 25, 2007
Plaintiffs to serve rebuttal expert reports by	July 9, 2007
Defendant to serve supplemental expert reports by	July 23, 2007
Expert discovery cut-off	July 23, 2007

July 30, 2007

	1 2	Defendants' Opposition to Class Certification to be Plaintiffs' Reply to be filed by	e filed l	August 27, 2007 September 10, 2007
	3	Hearing on Motion for Class Certification (on or at	ter)	September 25, 2007
	4	Status Conference	To b	e determined by the Court
	5		Resp	ectfully submitted,
	7		•	•
	8	DATED: April 23, 2007	GOL BOR	DSTEIN, DEMCHAK, BALLER, GEN & DARDARIAN
	9			
	10		By:	/s/ Teresa Demchak TERESA DEMCHAK
	11			Attorneys for Plaintiffs CORNELIUS CLARK, CHESTER LEWIS, JOHN
2000	12			PONDS, AND GARRANT COSEY
Suite Suite	13			
Gordon & Rees LLP 5 Battery Street, Suite San Francisco, CA 941	14	DATED: April 23, 2007	GOR	DON & REES LLP
ordon ttery S Franci	15			
Gordon & Rees LLP 275 Battery Street, Suite 2000 San Francisco, CA 94111	16		By:	/s/ Brian P. Maschler BRIAN P. MASCHLER
7	17			Attorneys for Defendant ANNA'S LINENS, INC.
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		-3-	ONOE	CLASS CERTIFICATION DISCOVERY AND

1 **ORDER** 2 The Court has considered the above Stipulation, and good cause appearing therefor, the 3 Court modifies, approves, and hereby ORDERS the following schedule and deadlines for class 4 certification discovery and briefing. 5 **Non-Expert Discovery Schedule** 6 July 2, 2007 Complete non-expert interrogatories and document discovery by 7 8 Complete non-expert depositions (e.g., Parties, Fed.R.Civ.P. July 2, 2007 30(b)(6) deponents, witnesses and records custodians) by 9 10 **Expert Discovery and Reports** 11 Plaintiffs to provide Fed.R.Civ.P. 26(a)(2) expert disclosures October 31, 2006 275 Battery Street, Suite 2000 12 San Francisco, CA 94111 Plaintiffs' expert(s) to be made available for deposition by May 14, 2007 Gordon & Rees LLP 13 Defendants to provide Fed.R.Civ.P. 26(a)(2) expert June 11, 2007 14 disclosures by 15 Defendants' expert(s) to be made available for deposition by June 25, 2007 16 Plaintiffs to serve rebuttal expert reports by July 9, 2007 17 Defendant to serve supplemental expert reports by July 23, 2007 18 Expert discovery cut-off July 23, 2007 19 **Class Certification Briefing Schedule** 20 Motion for Class Certification to be filed by July 30, 2007 21 Defendants' Opposition to Class Certification to be filed by August 27, 2007 22 Plaintiffs' Reply to be filed by September 10, 2007 23 Hearing on Motion for Class Certification Friday, September 28, 2007 24 **Status Conference** November 9, 2007 25 26 IT IS SO ORDERED. 27 **DATED:** April 24, 2007 28